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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

1ST TECHNOLOGY LLC,

Plaintiff,

v.

IQ-LUDORUM PLC,
PLAYTECH CYPRUS LTD.,
TILTWARE LLC, and
KOLYMA CORPORATION, A.V.V.,

Defendants.

Case No.: 2:06-cv-323-LDG-RJJ

PLAINTIFF 1ST TECHNOLOGY LLC'S MOTION FOR LEAVE TO FILE A SUPPLEMENTAL MEMORANDUM IN FURTHER SUPPORT OF ITS OPPOSITION TO DEFENDANT TILTWARE, LLC'S MOTION TO DISMISS FOR IMPROPER VENUE OR, IN THE ALTERNATIVE, FOR TRANSFER OF VENUE

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Plaintiff 1st Technology LLC, by and through its counsel of record HUTCHINSON & STEFFEN, LLC, respectfully moves the Court for entry of an order granting it leave to file a supplemental memorandum in further support of its opposition to Defendant Tiltware, LLC's motion to dismiss for improper venue / motion for transfer of venue. In support of this motion, 1st Technology relies upon the pleadings and papers of record to date and further states:

1. 1st Technology filed its Complaint for patent infringement on March 15, 2006, alleging infringement of U.S. Patent No. 5,564,001 by Tiltware among other defendants. On May 31, 2006, Tiltware filed its motion to dismiss for improper venue, or in the alternative, for transfer of venue. 1st Technology filed its opposition to Tiltware's motion on June 19, 2006, and Tiltware filed its reply thereto on July 3, 2006. The Court has not yet ruled on Tiltware's motion.

2. 1st Technology has recently obtained additional evidence which further supports 1st Technology's contentions that (1) the Court has personal jurisdiction over Tiltware, (2) venue is proper in this judicial district, and (3) the facts do not warrant a transfer of venue to the Central District of California. The additional material was distributed by Tiltware or its agents during the 2006 World Series of Poker held in Las Vegas, Nevada during the months of July and August. The referenced evidence is discussed in greater detail in 1st Technology's supplemental memorandum, attached hereto as Exhibit 1.

3. 1st Technology was not aware of said evidence at the time of filing its opposition memorandum on June 19, 2006.

4. 1st Technology has also recently converted to a Nevada limited liability company. 1st Technology's corporate presence in Nevada weigh against transferring venue to the Central District of California.

5. So that the record is more complete, 1st Technology seeks leave to file the short supplemental memorandum attached hereto as Exhibit 1.

6. This motion is brought in the interests of justice and not for the purpose of delay.

DATED this 27th day of September, 2006

Respectfully Submitted,

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Attorneys for 1st Technology LLC

CERTIFICATE OF SERVICE

I hereby certify that, on the 27th day of September, 2006, I deposited for mailing in the U.S. Mail a true and correct copy of the foregoing **PLAINTIFF 1ST TECHNOLOGY LLC'S MOTION FOR LEAVE TO FILE A SUPPLEMENTAL MEMORANDUM IN FURTHER SUPPORT OF ITS OPPOSITION TO DEFENDANT TILTWARE, LLC'S MOTION TO DISMISS FOR IMPROPER VENUE OR, IN THE ALTERNATIVE, FORTRANSFER OF VENUE** to the following counsel of record:

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